

# EXHIBIT A

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI

LENARD LUCKETT, )  
vs. )  
Plaintiff, ) Cause No.  
vs. ) Division  
GUARDIAN LIFE INSURANCE )  
COMPANY OF AMERICA, )  
)  
Serve: CSC-Lawyers Incorporating )  
Service Company, Registered Agent )  
221 Bolivar Street )  
Jefferson City, MO 65101 )  
)  
Defendant. )

**PETITION FOR DAMAGES**

COMES NOW Plaintiff, LENARD LUCKETT, by and through counsel, Nathan S. Cohen, and for his Petition for Damages against Defendant, GUARDIAN LIFE INSURANCE COMPANY OF AMERICA, states to the court as follows:

1. That at all times relevant herein, Plaintiff is an was an individual over the age of 18 year residing and a resident of St. Louis County, State of Missouri.
2. At all time relevant herein, Defendant Guardian Life Insurance Company of America is and was an is a New York company registered to do business in the State of Missouri and operating as an insurance company, engaged in the business of life insurance and regularly soliciting business from, issuing policies to, and collecting premiums from Missouri residents.
3. At the time of his death, Curtis Saahir was insured under a policy of life insurance issued by Defendant under a plan held by Saahir's employer, Laminated and Fabricated, Plan No. 00558672, insuring his life, with Plaintiff named as beneficiary under said policy.

4. During his lifetime, Curtis Saahir, either individually or through his employer, paid all premiums due on the policy and met all conditions of continuing insurability pursuant to the policy.

5. Plaintiff Lenard Luckett was named sole beneficiary under the policy of insurance.

6. Defendant refused to pay on said policy of life insurance solely to Plaintiff, taking the position that Plaintiff is not the beneficiary of the policy.

7. Plaintiff notified Defendant that he disputed Defendant's assertion that he was not the named or intended sole beneficiary under the life insurance policy of Curtis Saahir.

8. Knowing that the rightful beneficiary of the life insurance policy of Curtis Saahir was in dispute, and in contravention of Curtis Saahir's intentions and in derogation of Plaintiff's rights, Defendant paid on said policy to the heirs of Curtis Saahir without any direction or court order.

9. It was the intention of Curtis Saahir that Lenard Luckett be designated as sole beneficiary of said policy upon his death.

10. As a result of Defendant's actions, Plaintiff has endured a great deal of emotional anxiety attendant to the death of Curtis Saahir, his brother, and has been deprived of his rights to the benefit of the proceeds of the life insurance policy covering the life of his brother.

11. As a result of Defendant's actions, Plaintiff has been damaged.

12. Plaintiff has incurred attorney's fees and costs associated with the behavior of Defendant and Defendant's failure to pay under the life insurance policy as intended.

WHEREFORE, Plaintiff prays for judgment against Defendant for damages in an amount in excess of \$25,000.00, and for an award of Plaintiff's attorney's fees and costs incurred herein, and for such other and further orders this court deems just and proper in the premises.

LAW OFFICE OF NATHAN S. COHEN

By: /s/ Nathan S. Cohen  
Nathan S. Cohen, #36072  
Attorney for Plaintiff  
210 South Bemiston Avenue  
St. Louis, MO 63105  
(314) 727-6088 - Telephone  
(314) 727-6081 - Facsimile  
[nathan@nathanscohen.com](mailto:nathan@nathanscohen.com)



## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: ELIZABETH BYRNE HOGAN	Case Number: 2422-CC11243	
Plaintiff/Petitioner: LENARD LUCKETT vs.	Plaintiff's/Petitioner's Attorney/Address NATHAN S COHEN 210 SOUTH BEMISTON AVENUE ST LOUIS, MO 63105	
Defendant/Respondent: GUARDIAN LIFE INSURANCE COMPANY OF AMERICA	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Other Tort		(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: GUARDIAN LIFE INSURANCE COMPANY OF AMERICA

Alias:

CSC LAWYERS INCORPORATING  
SERVICE COMPANY, RAGT  
221 BOLIVAR STREET  
JEFFERSON CITY, MO 65101

COLE COUNTY, MO



You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

October 1, 2024

Circuit Clerk

Further Information:

## Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

delivering a copy of the summons and petition to the defendant/respondent.  
 leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with \_\_\_\_\_, a person at least 18 years of age residing therein.  
 (for service on a corporation) delivering a copy of the summons and petition to: \_\_\_\_\_ (name) \_\_\_\_\_ (title).  
 other: \_\_\_\_\_.

Served at \_\_\_\_\_ (address)  
 in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$._____ per mile)
Total	\$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI

LENARD LUCKETT, )  
vs. )  
Plaintiff, ) Cause No. 2422-CC11243  
vs. )  
Division 1  
GUARDIAN LIFE INSURANCE )  
COMPANY OF AMERICA, )  
Defendant. )

**MEMORANDUM TO CLERK PERTAINING TO SERVICE**

COMES NOW Plaintiff, LENARD LUCKETT, by and through counsel, and files his server's return of Summons and Petition in this cause upon Defendant, GUARDIAN LIFE INSURANCE COMPANY OF AMERICA, along with the cost bill for service, and requests said cost to be taxed herein.

LAW OFFICE OF NATHAN S. COHEN

By: /s/ Nathan S. Cohen  
Nathan S. Cohen, #36072  
Attorney for Plaintiff  
210 South Bemiston Avenue  
St. Louis, MO 63105  
(314) 727-6088 - Telephone  
(314) 727-6081 - Facsimile  
[nathan@nathanscohen.com](mailto:nathan@nathanscohen.com)

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true copy of the foregoing was electronically filed on October 3, 2024 with the Clerk of the Circuit Court by using the Missouri e-Filing System, and that participants in the case who are registered users will be served by the system pursuant to Rule 103.08.

/s/ Nathan S. Cohen



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Defendant/Respondent: GUARDIAN LIFE INSURANCE COMPANY OF AMERICA	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
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CITY OF ST LOUIS

COLE COUNTY, MO

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October 1, 2024

Date

Circuit Clerk

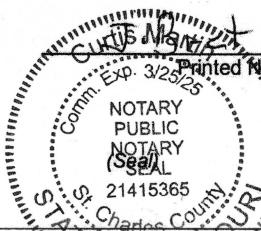
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 leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with \_\_\_\_\_, a person at least 18 years of age residing therein.  
 (for service on a corporation) delivering a copy of the summons and petition to: LAUREN SHIPLEY - CSC LAWYERS (name) CSC LAWYERS - Processor (title).  
 other: \_\_\_\_\_

Served at CSC LAWYERS, 221 Bolivar St., Jefferson City (address)  
in Cole (County/City of St. Louis), MO, on OCT 3, 2024 (date) at 9:30 AM (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on 10/03/24 (date).My commission expires: 03/25/25

Date

Notary Public

## Sheriff's Fees if Applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ \_\_\_\_\_

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ . \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

**STL Investigations**

10 Amber Meadows Dr  
 O Fallon, MO 63366-3984  
 STLInvestigate@gmail.com

**INVOICE****BILL TO**

Nathan S. Cohen  
 210 South Bemiston Avenue  
 Missouri  
 St. Louis, MO 63105

**INVOICE #** 4083  
**DATE** 10/03/2024  
**DUE DATE** 11/02/2024  
**TERMS** Net 30

<b>STL CASE #</b>	<b>CLIENT JOB # / NAME</b>	<b>REQUESTED BY</b>
24-3835	Luckett, Lenard	Christine

DATE	DESCRIPTION	QTY	RATE	AMOUNT
	Guardian Live Insurance Company of America - Jefferson City	1	90.00	90.00

MO PI #2010007682	BALANCE DUE	<b>\$90.00</b>
MO PI Agency #2017029207		
IL PI #115.002561		
IL PI Agency #117.001791		
KS PI #D-5568		
STL City SPS #627		